EXHIBIT A

Derek C. Chen

From:	Derek C. Chen
Sent:	Friday, October 26, 2018 8:55 AM
To:	'joe@joethomas.org'
Cc:	Jayne L. Freeman; LaHoma Walker
Subject:	RE: UW/Dalessio - Request to Stay Plaintiff's Second Set of Discovery Requests

Joe,

Thank you for your response. It sounds like we have more availability than you next week, so go ahead and tell us when you are available and we will work to accommodate those times. We agree the discovery conference should focus on what you believe you need to respond to Defendants' Motion for Summary Judgment, filed yesterday. Defendants' will consider striking our Motion for a Protective Order if we can agree on documents you reasonably need to respond to the MSJ and you agree to stay the rest until after the MSJ is ruled on. I hope we are able to come to an agreement, as it sounds like both sides are willing to compromise. I look forward to hearing from you.

Sincerely,

Derek

Derek C. Chen

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From: joe@joethomas.org <joe@joethomas.org>
Sent: Wednesday, October 24, 2018 10:27 AM
To: Derek C. Chen <DChen@kbmlawyers.com>
Cc: Jayne L. Freeman <JFreeman@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>; 'JULIE'

\<juliedalessio@msn.com\>
Subject: RE: UW/Dalessio - Request to Stay Plaintiff's Second Set of Discovery Requests

Hello Derek,

First, to answer your question, Ms. Dalessio does not agree to any stay of discovery.

I am not available for discovery conference this week. I have a very busy week this week. I have limited availability next week, October 29-31. Please give me a couple dates and times that work for you and I will tell you what is best for me. Additionally, during our discovery conference, I would like to talk about Defendants producing the second set of discovery because it appears the second set of discovery is due on or about October 29, 2018.

I think it is incumbent upon me to identify that we have had previous conversations that Ms. Dalessio argues that much of her discovery is aimed at gathering evidence of material facts that will be at issue in summary judgment. It would be more expeditious for Defendants to give Ms. Dalessio all of the discovery necessary for summary judgment rather than for Defendants to file for summary judgment and have it postponed because there are essential facts unavailable to the nonmovant. *See* Rule 56(d).

My client sincerely hopes that we can work together and come to a mutual agreement. Please let me know what you think.

Very truly yours,

Joe

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From: Derek C. Chen \<DChen@kbmlawyers.com\>
Sent: Tuesday, October 23, 2018 4:00 PM
To: joe@joethomas.org
Cc: Jayne L. Freeman \<JFreeman@kbmlawyers.com\>; LaHoma Walker \<LWalker@kbmlawyers.com\>
Subject: UW/Dalessio - Request to Stay Plaintiff's Second Set of Discovery Requests

Joe,

On September 28, 2018, during your self-stated period of unavailability, you served a Second Set of Discovery Requests on Defendants in the Dalessio case. As agreed, we did not file our Motion for Summary Judgment during your absence even after learning you had internet access and were able to serve motions and discovery. I am writing to request a similar professional courtesy and formally request a stay of your Second Set of Discovery Requests to Defendants until after our summary judgment motion is filed and resolved. We will be filing the motion this Thursday. If there is limited discovery that you believe you need to respond to our MSJ, you can address that in a CR 56(f) motion. As discussed on our call before you left in September, we believe this is the most efficient and cost-effective way for both parties and the Court to handle any remaining discovery.

If you are not willing to agree to a stay, please let us know your availability either tomorrow or Thursday for a discovery conference regarding this issue. If we cannot reach agreement, Defendants will note up another Motion for a Protective Order.

Thank you and I hope you had a great trip.

Sincerely,

Derek

Derek C. Chen

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